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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

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**TROVE BRANDS, LLC D/B/A THE
BLENDERBOTTLE COMPANY**

Plaintiff,

Case No: 2:22-cv-02222-TLN-CKD,

v.

TRRS MAGNATE LLC D/B/A HYDRA CUP,

Defendant.

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**DEFENDANT HYDRA CUP’S NOTICE OF MOTION AND MOTION TO
COMPEL PLAINTIFF BLENDERBOTTLE TO PROVIDE SUFFICIENT
ANSWERS AND PRODUCE RESPONSIVE DOCUMENTS**

Date: 22 March 2024
Time: 10:00 a.m.
Courtroom: 24, 8th Floor.
Hon. Troy L. Nunley
Hon. Carolyn K. Delaney

TO PLAINTIFF TROVE BRANDS, LLC AND ITS COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Defendant TRRS Magnate LLC d/b/a Hydra Cup (“Hydra Cup”), through its attorneys, will move this Court pursuant to Federal Rule of Civil Procedure 37(a) and Local Rule 251, before the Honorable Carolyn K. Delaney, United States District Court for the Eastern District of California, at the United States District Courthouse, 8th Floor, Courtroom 24 at 501 I Street, Sacramento on 22 March 2024 at 10:00 a.m. or as soon thereafter as the matter may be heard, to compel Plaintiff Trove Brands, LLC d/b/a the BlenderBottle Company (“BlenderBottle”) (i) to fully respond to and provide sufficient and proper answers to Hydra Cup’s Interrogatory Nos. 3, 4, 6, 7, 11, 14-16, 18-21, 24, and 25; (ii) to provide documents responsive to Hydra Cup’s Requests for the Production of Documents and Things Nos. 6, 10-21, 26, 31, 33, 36-40, 43-44, 47-48, 52-55, 58-60, 62, 67, 73-74, 81, 85, 88, 90-92, 95, 98-99, 101, 103-04, 109-10, 114-16, 120-22, 125-26, 128, 131-

38, 141, 143-44, 150-154, 159, 166-68, 170, 172, 175-76, 185-86, 190, 193, 203, 205, 207-12; (iii) to provide responsive communications and electronic correspondence; (iv) to determine the sufficiency of BlenderBottle's Answers, Responses, and Objections to Hydra Cup's Interrogatories and Requests for the Production of Documents and Things, by 29 March 2024, and for an order that BlenderBottle pay Hydra Cup's reasonable expenses and attorneys' fees in bringing this Motion pursuant to Fed. R. Civ. P. 37(a), and for other and further relief as the Court deems just and proper. There exists good cause to support this Motion. Hydra Cup is serving on BlenderBottle its portion of the Joint Statement Re Discovery Disagreements more than twenty-one days before the scheduled hearing, which will be filed with the Court not less than fourteen days before the scheduled hearing pursuant to Local Rule 251.

Pursuant to Local Rule 251(b), the parties met and conferred three times pursuant to Hydra Cup's requests—on 09 January 2024, 09 February 2024, and 12 February 2024—in a good faith effort to resolve these issues, but were unable to do so. Hydra Cup certifies that it made numerous attempts to get BlenderBottle to comply with its discovery obligations under the Federal Rules of Civil Procedure. These efforts, which have occurred for almost six months, have included telephonic conferences of counsel, a series of letters, and numerous emails. Despite Hydra Cup's efforts, the parties have not resolved their differences that are the subject of

1 this motion, including without limitation BlenderBottle's ongoing deficiencies in its
2 discovery responses and document production.

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4 **Dated:** 15 February 2024

5 Respectfully submitted,

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23 *Attorneys for Defendant TRRS Magnate, LLC dba Hydra Cup*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by CM/ECF and email on 15 February 2024 on Plaintiff Trove Brands, LLC d/b/a the BlenderBottle Company and its attorneys listed below:

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